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5 Attorneys for Defendant
6 COUNTY OF SANTA CLARA

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 *E-FILED - 8/2/06*

10 YUET LAN SO,) No. C06-02657 RMW
11 Plaintiff)
12 v.) STIPULATION AND [PROPOSED] ORDER
13 COUNTY OF SANTA CLARA,) TO EXTEND TIME TO RESPOND TO
14 PROBATION DEPARTMENT OF THE) COMPLAINT AND TO CONTINUE
15 COUNTY OF SANTA CLARA, and) INITIAL CASE MANAGEMENT
16 DOES 1 through 50, inclusive) CONFERENCE
17 Defendants.) (Civil L.R. 6-2, 6-3 and 16-2(a))
18 _____)

19 Pursuant to Civil L.R. 6-2, 6-3 and 16-2(e), and the accompanying Affidavit of John L.
20 Winchester, III, the parties hereby stipulate and respectfully request an order extending
21 Defendants' time to respond to the complaint and enlarging the time for the Initial Case
Management Conference. The parties propose the following dates:

22 Response to complaint: August 3, 2006

23 Last day to:

- 24 • meet and confer re: initial disclosures, September 22, 2006
25 early settlement, ADR process and
discovery plan
- 26 • file ADR Certification
- 27 • File either Stipulation to ADR Process or
need for ADR Phone Conference

28 //

1 Last day to complete initial disclosures,
2 file Case Management Statement, and
3 file Rule 26(f) Report

October 6, 2006

20

(jg)

INITIAL CASE MANAGEMENT CONFERENCE: October 18, 2006.

IT IS SO STIPULATED.

Dated: July 18, 2006

Respectfully submitted,

6 ANN MILLER RAVEL
7 County Counsel

8 By: /S/
9 JOHN L. WINCHESTER, III
Deputy County Counsel

10 Attorneys for Defendant
11 COUNTY OF SANTA CLARA

12 Dated: July _____, 2006

13 By: CHARLES A. BONNER
14 Attorney for Plaintiff

IT IS SO ORDERED.

Dated: 8/2/06

15 /s/ Ronald M. Whyte
16 Judge of the United States District Court

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1 Last day to complete initial disclosures,
2 file Case Management Statement, and
3 file Rule 26(f) Report

October 6, 2006

20

3 INITIAL CASE MANAGEMENT CONFERENCE: October 18, 2006. (jg)

4 IT IS SO STIPULATED.

5 Dated: July _____, 2006

Respectfully submitted,

6 ANN MILLER RAVEL
7 County Counsel

8 By:

JOHN L. WINCHESTER, III
Deputy County Counsel

9 Attorneys for Defendant
10 COUNTY OF SANTA CLARA

11 By:

CHARLES A. BONNER
Attorney for Plaintiff

12 Dated: July 18, 2006

13 IT IS SO ORDERED.

14 Dated: _____

15 Judge of the United States District Court

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